

AMERICAN CASUALTY COMPANY OF
READING, PENNSYLVANIA,

Plaintiff,

VS.

Case No. 4:14CV-00494

PAUL CHANG, individually;
PAUL CHANG R.P.T., PC;
SARA CLARK by and through her guardian
and conservator, Wanda Clark; and
WANDA CLARK, individually,

Defendants.

CLARK DEFENDANTS' MOTION TO STAY PROCEEDINGS

Defendants Wanda Jeanette (née Clark) Gossett and Sara Clark, by and through her guardian and conservator, Wanda Jeanette Gossett, respectfully move this Court to stay this proceeding during the pendency of parallel state proceedings involving the same parties, the same insurance policy, and the same coverage question under state law as this case.

Defendants hereby incorporate by this reference their Memorandum of Law in support of this motion, filed concurrently herewith, as if fully set forth herein.

CALL & GENTRY LAW GROUP, LLC

By: /s/ Blake I. Markus

Blake I. Markus #61755
3218 Emerald Lane, Ste. C
Jefferson City, MO 65109
(573) 644-6090
(573) 644-6922 (fax)
blake@callgentry.com
ATTORNEYS FOR DEFENDANTS
SARA CLARK and WANDA GOSSETT

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

R.C. Wuestling
Wuestling & James, L.C.
720 Olive St., Suite 2020
St. Louis, MO 63101
wuestling@wuestlingandjames.com

David Howard Timmins
Gardere Wynne & Sewell, LLP
1601 Elm St., Suite 3000
Dallas, TX 75201
dtimmins@gardere.com

Attorneys for Plaintiff American Casualty Company of Reading, Pennsylvania

Michael E. McCausland and Jordan Burns
McCausland Barrett & Bartalos PC
9233 Ward Parkway, Suite 270
Kansas City, MO 64114-3360
mmccausland@mbblawfirmkc.com
jburns@mbblawfirmkc.com
Attorneys for Chang Defendants

/s/ Blake I. Markus